



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
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June 6, 2013

Mr. Matt Wickham
Pastor, Behling & Wheeler LLC
620 E. Airline
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Re: EPA's Comments on the Response Letter and Revised Draft Preliminary Conceptual Site Model, May 2013, for the US Oil Recovery Superfund Site

Mr. Wickham

EPA received a response letter dated May 28, 2013 to EPA's comments on the Draft Preliminary Conceptual Site Model (CSM) and the revised Draft Preliminary CSM dated May 2013. EPA has reviewed these documents and EPA's comments to the draft Conceptual Site Model are given below. They include comments both from EPA's Ecological Risk Assessor and from EPA's Human Health Risk Assessor.

Ecological Risk Assessor's comments

1. Figures 1-4: The second, third, and fourth iteration of the sampling need to be combined. There is no reason to do more than two iterations. If a COPC is detected on-site (first iteration sampling), or if the site history indicates that a release of the COPC was likely, then that COPC (or category of COPCs) should be evaluated in all the off-site sampling for all media.
2. We may want to add pipelines to the primary source category.
3. Figure 1 and 3, air sampling: For vapor intrusion we can screen using groundwater and soil data but we will need to collect vapor samples if screen indicates potential risk.
4. Figure 1 and 3, footnote 4: Do we have data that shows that all surface water is salt water? Is there a pathway to freshwater? If so this footnote is not correct. It may be premature to eliminate this pathway. It should be shown as a potentially complete pathway.
5. Figure 2: We need to determine if the groundwater to on-site surface water and on-site sediment pathway is complete.

Human Health Risk Assessor's comments

- The comments responding to the last iteration of the CSM were addressed for the most part but it seems a lot is pending on the RI/FS and groundwater migration investigation. Specifically, ground water flow needs to be evaluated to delineate migration of COCs off-site.

If you have questions or would like to discuss these comments please contact me at 214-665-8529 and I can set up a conference call with all the parties involved.

Sincerely,



Raji Josiam
Remedial Project Manager, Superfund Division

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